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December 8, 2000

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Re: Docket No. 00-00691; Sprint Communications Company L.P.  
Arbitration Petition with BellSouth Telecommunications, Inc.

Pursuant to the November 9, 2000 Notice of Procedural Schedule issued in the above case, enclosed for filing are the original and thirteen copies of Sprint Communications Company L.P.'s Objections to BellSouth Telecommunications, Inc.'s First Interrogatories and First Request for Production of Documents.

Please contact me if you have any questions.

Very truly yours,

James B. Wright

JBW:sm

Enclosure

cc: Guy Hicks (with enclosure)  
E. Earl Edenfield, Jr.  
William R. Atkinson

POSTED

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**

In re:

Petition of Sprint Communications	)	
Company L.P. for Arbitration with	)	
BellSouth Telecommunications, Inc.	)	Docket No.: 00-00691
Pursuant to Section 252(b) of the	)	
Telecommunications Act of 1996.	)	

**OBJECTIONS OF SPRINT COMMUNICATIONS COMPANY L. P. TO  
BELLSOUTH'S FIRST INTERROGATORIES AND FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS**

In accordance with the Tennessee Regulatory Authority's ("Authority" or "TRA") Notice of Procedural Schedule issued on November 9, 2000, Sprint Communications Company L.P. ("Sprint") hereby files its objections to BellSouth Telecommunications, Inc.'s First Interrogatories ("Interrogatories") and First Request for Production of Documents ("POD Request"). Sprint notes that although it is stating its objections at this time, Sprint will, in an effort to be responsive, provide a response to some Interrogatories or POD Requests notwithstanding the stated objection.

**General Objections**

1.

Sprint objects to each and every one of the Interrogatories, POD Requests and instructions to the extent that such Interrogatory, POD Request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product doctrine, or other applicable privilege.

2.

To the extent that the Interrogatories or POD Requests are intended to be continuing in nature, Sprint objects in that the requested information falls outside the scope of discovery contemplated by the Procedural Schedule issued in this case.

3.

Sprint is a large corporation with employees located in many different locations in Tennessee and in other states. In the course of its business, Sprint creates countless documents that are not subject to TRA or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests for production of documents and interrogatories. Sprint will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the POD Requests and Interrogatories purport to require more, Sprint objects on the grounds that compliance would impose an undue burden or expense.

### Objections to BellSouth's Interrogatories

2. Identify any and all evaluations, reports, analyses, memoranda or other documents prepared by or for Sprint that directly relate to or concern any specific issue raised by Sprint in its Petition and/or the Joint Positions Matrix filed by the Parties on November 17, 2000.

Sprint objects to this Interrogatory as unduly broad and overly burdensome. It would require an enormous effort on the part of Sprint to identify "all documents that refer or

relate” to any *one* issue contained in Sprint’s Petition, much less all of the issues. Further, the parties have settled several issues included in Sprint’s original arbitration Petition.

3. Identify the number of access lines in Tennessee for which Sprint provides local telephone service, separating them between business and residential access lines.

Sprint objects to this Interrogatory as entirely irrelevant to the issues presented for arbitration in this proceeding. In addition, if responded to, Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

4. Does Sprint own, have an interest in, or is Sprint affiliated in any way with an ISP in Tennessee (other than as a customer)? If so, explain in full the nature of such interest or affiliation and identify all documents that refer or relate to such interest or affiliation.

To the extent that this Interrogatory calls for information relating to “all” documents referring or relating to Sprint’s interest or affiliation with an ISP in Tennessee, Sprint objects in that the information requested is unduly broad and overly burdensome.

5. State the actual cost (as an average cost per minute, if calculable) Sprint incurs in transporting ISP traffic from the point of interconnection with BellSouth in Tennessee to the ISP server being served by a Sprint switch. If this information is not available on a per minute basis, state what information is available that relates to this cost. In answering this interrogatory, describe in detail how this cost was calculated and identify all documents referring or relating to such calculation. If Sprint has made no such calculation and has no idea what the cost of transporting ISP traffic in such a manner would be, please so state.

Sprint objects to this Interrogatory in that it calls for information not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action because Sprint is not in this arbitration seeking to be paid reciprocal compensation based upon its own costs. In addition, if responded to, Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

6. Please state the total number of local end user customers that Sprint serves within the state of Tennessee, separated into residential and business customers. If Sprint has no further information other than the number of lines provided in response to an earlier request, please say so.

Sprint objects to this Interrogatory as entirely irrelevant to the issues presented for arbitration in this proceeding. In addition, if responded to, Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

8. Does Sprint deliver traffic to ISPs located outside the rate center in which the call to the ISP originated?

Sprint objects to this Interrogatory in that it is vague. It is not clear from the context of the Interrogatory how Sprint “delivers” traffic to ISPs.

9. If the answer to Interrogatory 8 is in the affirmative, describe the network architecture used by Sprint to deliver traffic to ISPs located outside the rate center in which the call to the ISP originated.

Sprint objects to this Interrogatory in that it is vague. It is not clear from the context of the Interrogatory how Sprint “delivers” traffic to ISPs. In addition, if responded to, Sprint anticipates all or a portion of its response would contain highly confidential or proprietary

information and any response to be provided will be conditioned on the entry of an approved protective order.

10. If the answer to Interrogatory 8 is in the affirmative, state whether or not Sprint collects reciprocal compensation for traffic delivered to ISPs located outside the rate center in which the call to the ISP originated.

Sprint objects to this Interrogatory in that it is vague. It is not clear from the context of the Interrogatory how Sprint “delivers” traffic to ISPs.

11. State the number of resold lines Sprint has in Tennessee, broken down by residence and business lines, if not provided in response to an earlier interrogatory.

Sprint objects to this Interrogatory as entirely irrelevant to the issues presented for arbitration in this proceeding. In addition, Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

16. Does Sprint have facilities in place to serve customers in each of BellSouth’s local calling areas?

Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

17. Does Sprint currently serve customers in each of BellSouth’s local calling areas in Tennessee? If so, identify each such BellSouth local calling area.

Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

18. State the number of switches Sprint has deployed in Tennessee including the location, switch type (including the model and manufacturer), and the date the switch became operational.

Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

19. State whether any of the switches identified in response to Interrogatory 18 are currently providing local switching for Sprint local customers. If so, please identify each such switch by location, switch type (including the model and manufacturer), and the date the switch became operational for purposes of providing local service.

Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

20. Does Sprint contend that any of the switches identified in Interrogatory 18 actually perform local tandem switching functions in Tennessee? If so, please identify each such switch by location, switch type (including the model and manufacturer), and the date the switch began actually performing local tandem switching functions. Also, for each switch identified herein, describe in detail the actual local tandem switching functions being performed by the switch and identify all documents that support Sprint's response.

Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

21. Does Sprint contend that its local switches in the state of Tennessee, if any, serve a comparable geographic area to BellSouth's tandem switch? If the answer to this Interrogatory is in the affirmative, please state all facts and identify all documents that support this contention.

Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

22. For each of the wire centers served by BellSouth's tandem switches in Tennessee, state the total number of customers in each such wire center to which Sprint provides local telephone exchange service.

Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

23. If Sprint contends that any of the switches identified in response to an earlier Interrogatory is capable of providing local service, even if not currently providing such service, state whether any changes in the switch, i.e. software updates, additional hardware modules, would be required in order to actually enable the switches to provide local switching.

Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.



24. Does Sprint agree that where an originating carrier, using its own facilities, mixes originating long distance calls and originating local calls that ultimately terminate to an Sprint local customer, that Sprint wants the calls separated and, in such circumstances, Sprint wants to bill any terminating access charges that might be due?

Sprint objects to this Interrogatory in that it is vague. It is not clear from the context of the Interrogatory what the phrase “originating carrier”, and the word “separated” mean.

25. Does Sprint agree that in the circumstances described in interrogatory 24 above, Sprint wants BellSouth to bill the originating carrier for the local calls referred to therein?

Sprint objects to this Interrogatory in that it is vague. It is not clear from the context of the Interrogatory what the phrase “originating carrier”, and the word “separated” mean.

26. If the answer to interrogatory 25 is not an unqualified affirmative answer, is it correct that Sprint does not want to bill the originating carrier reciprocal compensation charges for terminating the local call to Sprint’s customer in the circumstances described in interrogatory 24?

Sprint objects to this Interrogatory in that it is vague. It is not clear from the context of the Interrogatory what the phrase “originating carrier”, and the word “separated” mean.

27. Please explain why, when an originating carrier, using its own facilities, sends long distance calls and local calls to Sprint’s end users over the same terminating facilities, Sprint wants to bill the terminating access charges, but not charges associated with the local calls.

Sprint objects to this Interrogatory in that it is vague. It is not clear from the context of the Interrogatory what the phrase “originating carrier” means.

28. Does Sprint track its own internal performance data at the metropolitan statistical area (MSA) level? If so, provide Sprint’s internal performance data for each corresponding performance measurement or SQM Sprint proposes in this proceeding.

To the extent that the Interrogatory can be read to apply to jurisdictions other than Tennessee, Sprint objects in that the Interrogatory is irrelevant to the issues presented for arbitration in this docket. Sprint is not required to track its own internal performance data for each corresponding performance measurement or SQM in Tennessee.

29. If Sprint’s response to Interrogatory 28 is in the negative, how does Sprint track its own internal performance data and at what level of disaggregation?

To the extent that the Interrogatory can be read to apply to jurisdictions other than Tennessee, Sprint objects in that the Interrogatory is irrelevant to the issues presented for arbitration in this docket. Sprint is not required to track its own internal performance data for each corresponding performance measurement or SQM in Tennessee.

#### **Sprint’s Objection to BellSouth’s Request for Production of Documents**

2. Produce all documents referring, relating or pertaining to the payment to or by Sprint or any other ILEC or CLEC of reciprocal compensation for ISP-bound traffic. To be perfectly clear, BellSouth believes that Sprint has memoranda in which its employees discuss whether payment of reciprocal compensation for ISP traffic is required or appropriate.

See General Objection No. 1, above. Further, Sprint objects to the Request as overly broad and unduly burdensome.

3. Produce all documents referring, relating or pertaining to telephone-to-telephone voice calls delivered over IP Telephony.

Sprint objects to this Request as overly broad and unduly burdensome

4. Produce all documents referring or relating to forecasted growth of Sprint's local market in Tennessee over the next 24 months.

Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

5. Produce all documents referring or relating to historical growth of Sprint's local market in Tennessee over the past 24 months.

Sprint anticipates all or a portion of its response would contain highly confidential or proprietary information and any response to be provided will be conditioned on the entry of an approved protective order.

6. Produce all documents referring, relating or pertaining to any agreements to which Sprint is a party that involves the sharing of any reciprocal compensation received by Sprint from BellSouth.

Sprint objects to this Interrogatory in that it is vague. It is not totally clear from the context of the Interrogatory what the phrase "sharing of reciprocal compensation" means.

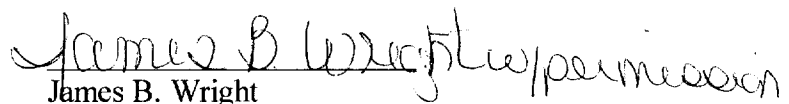
7. Produce all documents referring, relating or pertaining to any ownership or interest Sprint has in an ISP in Tennessee.

See General Objection No. 1, above. Further, Sprint objects to the Request in that it is overly broad and unduly burdensome, as well as entirely irrelevant to the issues presented for arbitration in this proceeding.

9. Produce any document relied upon by Sprint in preparing any answer to any Interrogatory in this proceeding.

Sprint objects to this Request as overly broad and unduly burdensome.

Respectfully submitted this 8<sup>th</sup> day of December, 2000.

  
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-And-

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